

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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INTEGRATED HEALTH SERVICES OF  
CLIFF MANOR, INC., INTEGRATED  
HEALTH SERVICES AT RIVERBEND,  
INTEGRATED HEALTH SERVICES AT  
SOMERSET VALLEY, INC., ALPINE  
MANOR, INC., BRIARCLIFF NURSING  
HOME, INC., INTEGRATED HEALTH  
GROUP, INC., SPRING CREEK OF IHS, INC.,  
FIRELANDS OF IHS, INC., ELM CREEK OF  
IHS, INC., and IHS LONG TERM CARE  
SERVICES, INC.,

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

v.

ABE BRIARWOOD CORPORATION and  
JOHN DOES 1-10,

Additional Counterclaim  
Defendants.

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Civil Action No. 04-910 (GMS)

**NOTICE TO TAKE DEPOSITION OF A NON-PARTY**

PLEASE TAKE NOTICE that defendant THCI Company LLC will take testimony by deposition, upon oral examination, before a person authorized by the laws of the State of New York to administer oaths, on May 2, 2006, commencing at 10:00 a.m. at the office of Pitney Hardin LLP, 7 Times Square, New York, NY 10036-7311 and on any adjourned date thereof, and from day to day thereafter until completed, with respect to the subject matter of this action, at which time and

place the deposition of Uri Kaufman will be taken in accordance with the attached Subpoena Duces Tecum. As counsel for Plaintiffs you are invited to attend and cross-examine.

PLEASE TAKE FURTHER NOTICE that, at the time and place aforesaid, Uri Kaufman has been directed to produce each of the documents specified in the attached Subpoena Duces Tecum.

CONNOLLY BOVE LODGE & HUTZ LLP



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DATED: April 4, 2006